

Fill in this information to identify your case:

United States Bankruptcy Court for the:

EASTERN DISTRICT OF VIRGINIA

Case number (if known)

Chapter 11

Check if this an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Model Tobacco Development Group, LLC

2. All other names debtor used in the last 8 years

Include any assumed names, trade names and doing business as names

3. Debtor's federal Employer Identification Number (EIN) 82-4435194

4. Debtor's address Principal place of business

5103 Yuma St NW
Washington, DC 20016

Number, Street, City, State & ZIP Code

Mailing address, if different from principal place of business

P.O. Box, Number, Street, City, State & ZIP Code

District of Columb
County

Location of principal assets, if different from principal place of business

1100 Richmond Highway Richmond, VA 23224
Number, Street, City, State & ZIP Code

5. Debtor's website (URL)

6. Type of debtor

- Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
- Partnership (excluding LLP)
- Other. Specify: _____

Debtor

Model Tobacco Development Group, LLC

Name

Case number (if known)

7. Describe debtor's business

A. Check one:

- Health Care Business (as defined in 11 U.S.C. § 101(27A))
- Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- Railroad (as defined in 11 U.S.C. § 101(44))
- Stockbroker (as defined in 11 U.S.C. § 101(53A))
- Commodity Broker (as defined in 11 U.S.C. § 101(6))
- Clearing Bank (as defined in 11 U.S.C. § 781(3))
- None of the above

B. Check all that apply

- Tax-exempt entity (as described in 26 U.S.C. §501)
- Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.**5313****8. Under which chapter of the Bankruptcy Code is the debtor filing?**

A debtor who is a "small business debtor" must check the first sub-box. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box.

Check one:

- Chapter 7
- Chapter 9
- Chapter 11. Check all that apply:

- The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, and it chooses to proceed under Subchapter V of Chapter 11. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- A plan is being filed with this petition.
- Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

- Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

If more than 2 cases, attach a separate list.

- No.
- Yes.

District _____	When _____	Case number _____
District _____	When _____	Case number _____

Debtor Model Tobacco Development Group, LLC Case number (if known) _____
Name _____

- 10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?**
- No
 Yes.

List all cases. If more than 1, attach a separate list

Debtor _____ Relationship _____
District _____ When _____ Case number, if known _____

- 11. Why is the case filed in this district?** Check all that apply:

- Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
 A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

- 12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?**

 No Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.**Why does the property need immediate attention? (Check all that apply.)**

- It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.
 What is the hazard? _____
 It needs to be physically secured or protected from the weather.
 It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
 Other _____

Where is the property?

Number, Street, City, State & ZIP Code _____

Is the property insured? No Yes. Insurance agency _____

Contact name _____

Phone _____

Statistical and administrative information

- 13. Debtor's estimation of available funds**

Check one:

- Funds will be available for distribution to unsecured creditors.
 After any administrative expenses are paid, no funds will be available to unsecured creditors.

- 14. Estimated number of creditors**

1-49
 50-99
 100-199
 200-999

1,000-5,000
 5,001-10,000
 10,001-25,000

25,001-50,000
 50,001-100,000
 More than 100,000

- 15. Estimated Assets**

\$0 - \$50,000
 \$50,001 - \$100,000
 \$100,001 - \$500,000
 \$500,001 - \$1 million

\$1,000,001 - \$10 million
 \$10,000,001 - \$50 million
 \$50,000,001 - \$100 million
 \$100,000,001 - \$500 million

\$500,000,001 - \$1 billion
 \$1,000,000,001 - \$10 billion
 \$10,000,000,001 - \$50 billion
 More than \$50 billion

- 16. Estimated liabilities**

 \$0 - \$50,000 \$1,000,001 - \$10 million \$500,000,001 - \$1 billion

Debtor

Model Tobacco Development Group, LLC

Name

Case number (*if known*) _____

- | | | |
|--|---|--|
| <input type="checkbox"/> \$50,001 - \$100,000 | <input checked="" type="checkbox"/> \$10,000,001 - \$50 million | <input type="checkbox"/> \$1,000,000,001 - \$10 billion |
| <input type="checkbox"/> \$100,001 - \$500,000 | <input type="checkbox"/> \$50,000,001 - \$100 million | <input type="checkbox"/> \$10,000,000,001 - \$50 billion |
| <input type="checkbox"/> \$500,001 - \$1 million | <input type="checkbox"/> \$100,000,001 - \$500 million | <input type="checkbox"/> More than \$50 billion |

Debtor

Model Tobacco Development Group, LLC

Name

Case number (if known)

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature
of authorized
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 30, 2024

MM / DD / YYYY

X /s/ Christopher A. Harrison

Signature of authorized representative of debtor

Christopher A. Harrison

Printed name

Manager of McKenzie Blake

Title Development Company, manager

18. Signature of attorney

X /s/ Justin P. Fasano

Signature of attorney for debtor

Date December 30, 2024

MM / DD / YYYY

Justin P. Fasano

Printed name

McNamee Hosea, P.A.

Firm name

6404 Ivy Lane, Suite 820

Greenbelt, MD 20770

Number, Street, City, State & ZIP Code

Contact phone 301-441-2420

Email address jfasano@mhlawyers.com

75983 VA

Bar number and State

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

IN RE:)
)
)
MODEL TOBACCO DEVELOPMENT) **24-**
GROUP, LLC)
)
Debtor and Debtor in Possession.) **CHAPTER 11**
)
)

NOTES TO PETITION

Model Tobacco Development Group, LLC (“Debtor”), by and through counsel, McNamee Hosea, P.A., with the assistance of its advisors, has filed with its Petition, a (1) List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders; and (2) Creditor’s Matrix with the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Court”), pursuant to section 521 of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 1007(d) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). These Notes pertain to, are incorporated by reference in, and comprise an integral part of all of the Debtor’s Petition. The Global should be referred to, considered, and reviewed in connection with any review of the Petition.

The Petition does not purport to represent financial statements prepared in accordance with Generally Accepted Accounting Principles in the United States (“GAAP”), nor is it intended to be fully reconciled with the financial statements of the Debtor. Additionally, the Petition contains unaudited information that is subject to further review and potential adjustment, and reflect the Debtor’s reasonable best efforts to report the assets and liabilities of the Debtor based on the information available to it. The Debtor and its agents, attorneys and financial advisors do not guarantee or warrant the accuracy or completeness of the data that is provided

herein and shall not be liable for any loss or injury arising out of or caused in whole or in part by the acts, errors or omissions, whether negligent or otherwise, in procuring, compiling, collecting, interpreting, reporting, communicating or delivering the information contained herein. While every effort has been made to provide accurate and complete information herein, inadvertent errors or omissions may exist.

The Debtor has signed the Petition. In reviewing and signing the Petition, the Debtor necessarily has relied upon the efforts, statements, and representations of its advisors. The Debtor has not (and could not have at this time) personally verified the accuracy of each statement and representation contained in the Petition, including statements and representations concerning amounts owed to creditors, classification of such amounts, and creditor addresses.

Reasonable efforts have been made to prepare and file as complete and accurate a petition as possible; however, inadvertent errors or omissions may exist. The Debtor reserves all rights to amend or supplement the Petition from time to time, in all respects, as may be necessary or appropriate, including, without limitation, the right to amend the Petition with respect to any claim (“Claim”) description, designation, or Debtor against which the Claim is asserted; dispute or otherwise assert offsets or defenses to any Claim reflected in the Petition as to amount, liability, priority, status, or classification; subsequently designate any Claim as “disputed,” “contingent,” or “unliquidated;” or object to the extent, validity, enforceability, priority, or avoidability of any Claim. Any failure to designate a Claim in the Petition as “disputed,” “contingent,” or “unliquidated” does not constitute an admission by the Debtor that such Claim or amount is not “disputed,” “contingent,” or “unliquidated.” Furthermore, nothing contained in the Petition shall constitute a waiver of rights with respect to the Debtor’s chapter 11 case, including, without limitation, issues involving Claims, substantive consolidation, defenses,

equitable subordination, and/or causes of action arising under the provisions of chapter 5 of the Bankruptcy Code and any other relevant non-bankruptcy laws to recover assets or avoid transfers. Any specific reservation of rights contained elsewhere in the Notes does not limit in any respect the general reservation of rights contained in this paragraph.

In compiling its list of 20 largest creditors, the Debtor has not excluded insiders, nor has it assigned a value to its collateral. Thus, all secured creditors are listed as having fully unsecured claims. Before filing its schedules and statement of financial affairs, it will update the value of its secured lender's collateral, and according the amount of their secured and unsecured claims. The Debtor does not, at this time, have a tenant list. Tenants will be added to the Debtor's creditor matrix as soon as possible.

MODEL TOBACCO DEVELOPMENT GROUP LLC

UNANIMOUS WRITTEN CONSENT OF MANAGER
IN LIEU OF SPECIAL MEETING AS OF DECEMBER 30, 2024

The undersigned, being the Manager (the “Manager”) of Model Tobacco Development Group, LLC, a Virginia limited liability company (the “Company”), does hereby adopt the following recitals and resolutions, and consents to the actions taken by virtue thereof, in all respects as though said recitals and resolutions were duly adopted by unanimous written consent of the undersigned this 30th day of December 2024:

WHEREAS, the Manager is informed and has determined that it is desirable and in the best interest of the Company, its creditors, its members, the Manager, and other interested parties, that the Company file a voluntary petition for relief under chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”).

WHEREAS, the Manager is informed and has determined that it is desirable and in the best interest of the Company, its creditors, its members, the Manager, and other interested parties, that the Company retain McNamee Hosea, P.A. (“Counsel”) as its bankruptcy and restructuring counsel.

NOW, THEREFORE, BE IT RESOLVED, that the filing by the Company of a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Court”) or such other court as may be recommended, be, and it hereby is, authorized and approved; and it is further

RESOLVED, that the Manager of the Company (the “Proper Officer”) be, and hereby is, authorized and empowered, in the name of the Company, to execute and verify a petition for relief under chapter 11 of the Bankruptcy Code, and such other petitions, schedules, lists, documents, pleadings, and other papers as Counsel shall deem necessary and appropriate, and to cause the same to be filed with the Bankruptcy Court on or as soon after December 30, 2024 as possible and take such other actions as Counsel shall deem necessary and appropriate; and it is further

RESOLVED, that in connection with the commencement of the chapter 11 case, Counsel be, and hereby is, authorized, empowered, and directed on behalf of the Company, to prepare and file a motion seeking the appointment of a chapter 11 trustee for the Company; and it is further

RESOLVED, that the Proper Officer be, and hereby is, authorized and directed to employ any other professionals necessary to assist the Company in carrying out its duties under the Bankruptcy Code, and to take any and all further actions and to execute and deliver any and all further instruments and documents and pay all expenses (subject to Bankruptcy Court approval, where necessary), in each case as in such Proper Officer’s judgment shall be necessary or desirable in order to fully carry out the intent and accomplish the purpose of the resolutions adopted herein; and it is further

RESOLVED, that all acts done or actions taken heretofore by any and the Proper Officer, which are necessary to effectuate the intent of the resolutions adopted herein, are hereby in all respects ratified, confirmed, and approved; and it is further

RESOLVED, that this Written Consent shall serve in lieu of any required special meeting and the undersigned hereby waive all requirements as to notice of a meeting; and it is further

RESOLVED, that this Written Consent may be executed in “.pdf”, facsimile or DocuSign, and in any number of counterparts, each of which shall be deemed an original and all of which taken together shall constitute one and the same instrument.

WITNESS the due execution hereof as of the date set forth above.

MANAGER: Model Tobacco Development Group, LLC

By: /s/ Christopher A. Harrison
Christopher A. Harrison, Manager
The McKenzie Blake Development Company, LLC
Manager of Model Tobacco Development Group LLC

The undersigned Initial Members hereby consent to the Resolutions hereinabove:

MEMBER: CAH Model Tobacco, LLC

By: /s/ Christopher A. Harrison
Christopher A. Harrison
Manager

MEMBER: MK Richmond LLC

By: /s/ Steven S. Snider
Steven S. Snider
Manager

MEMBER: SS Richmond LLC

By: Steven S. Snider
Steven S. Snider
Manager

MEMBER: Model Tobacco Master Tenant, LLC

By: Christopher A. Harrison

By: Model Tobacco Master Tenant MM, LLC

By: The McKenzie Blake Development Company, LLC

By: Christopher A. Harrison, Manager

Fill in this information to identify the case:

Debtor name Model Tobacco Development Group, LLC

United States Bankruptcy Court for the: EASTERN DISTRICT OF VIRGINIA

Case number (if known) _____

Check if this is an amended filing

Official Form 202

Declaration Under Penalty of Perjury for Non-Individual Debtors

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- Schedule A/B: Assets–Real and Personal Property* (Official Form 206A/B)
- Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- Schedule H: Codebtors* (Official Form 206H)
- Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- Amended Schedule*
- Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- Other document that requires a declaration* _____

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 30, 2024

X /s/ Christopher A. Harrison

Signature of individual signing on behalf of debtor

Christopher A. Harrison

Printed name

Manager of McKenzie Blake Development Company, manager

Position or relationship to debtor

Fill in this information to identify the case:

Debtor name	Model Tobacco Development Group, LLC
United States Bankruptcy Court for the:	EASTERN DISTRICT OF VIRGINIA
Case number (if known):	_____

Check if this is an
amended filing

Official Form 204

Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Virginia Housing Dev Authority 601 S Belvidere Street Richmond, VA 23220			Contingent Unliquidated Disputed	\$34,700,000.00	\$0.00	\$34,700,000.00
Cedar Rapids Bank and Trust Co 5400 Council St NE Cedar Rapids, IA 52402			Contingent Unliquidated Disputed	\$4,500,000.00	\$0.00	\$4,500,000.00
Walter Parks Architects 313 N. Adams Street Richmond, VA 23220	Walter Parks wparks@wparks.com	Business Debt	Contingent Unliquidated Disputed			\$446,128.00
City of Richmond Department of Public Utilities 730 E. Broad Street, 5th Fl Richmond, VA 23219	Customer Service DPUcustserv@rva.gov	Utility	Contingent Unliquidated Disputed			\$100,000.00
Hirschler Fleischer 2100 East Cary Street Richmond, VA 23223	David Lionberger dlionberger@hirschlerlaw.com	Business debt	Contingent Unliquidated Disputed			\$50,000.00
Williams Mullen 1700 Dominion Tower 999 Waterside Drive Norfolk, VA 23510		Business debt	Contingent Unliquidated Disputed			\$30,000.00
Dominion Energy PO Box 26543 Richmond, VA 23290	Customer Service PMP@support.domeenergyvanceb.com	Utility	Contingent Unliquidated Disputed			\$20,000.00

Debtor Name	Model Tobacco Development Group, LLC			Case number (if known)
Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services,	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.
				Total claim, if partially secured Deduction for value of collateral or setoff Unsecured claim
Timmons Group 1401 E. Cary Street Suite 401 Richmond, VA 23219		Business debt	Contingent Unliquidated Disputed	\$1,350.00
MK Richmond, LLC 2000 Massachusetts Avenue, NW Washington, DC 20036		Business debt	Contingent Unliquidated Disputed	\$1.00
SS Richmond, LLC 2000 Massachusetts Avenue, NW Washington, DC 20036		Business debt	Contingent Unliquidated Disputed	\$1.00
Kamran Raika 3219 Sailview Drive Midlothian, VA 23112		Business debt	Contingent Unliquidated Disputed	\$1.00
Christopher A. Harrison 5301 Westbard Circle Suite 147 Bethesda, MD 20816	chris@caharrisoncompanies.com	Business debt	Contingent Unliquidated Disputed	\$1.00
McKenzie Blake Development Co. 5301 Westbard Circle Suite 147 Bethesda, MD 20816		Business debt	Contingent Unliquidated Disputed	\$1.00
PNC National Bank, N.A. 300 Fifth Avenue, 14th Floor Pittsburgh, PA 15222			Contingent Unliquidated Disputed	\$1.00 \$0.00 \$1.00

Cedar Rapids Bank and Trust Co
5400 Council St NE
Cedar Rapids, IA 52402

Christopher A. Harrison
5301 Westbard Circle
Suite 147
Bethesda, MD 20816

City of Richmond
Department of Public Utilities
730 E. Broad Street, 5th Fl
Richmond, VA 23219

Dominion Energy
PO Box 26543
Richmond, VA 23290

Hirschler Fleischer
2100 East Cary Street
Richmond, VA 23223

Kamran Raika
3219 Sailview Drive
Midlothian, VA 23112

McKenzie Blake Development Co.
5301 Westbard Circle
Suite 147
Bethesda, MD 20816

Michael Howes
Troutman Pepper
401 9th Street NW Suite 1000
Washington, DC 20004

MK Richmond, LLC
2000 Massachusetts Avenue, NW
Washington, DC 20036

PNC National Bank, N.A.
300 Fifth Avenue, 14th Floor
Pittsburgh, PA 15222

SPE PNC Model Tobacco Master
Tenant LLC

SS Richmond, LLC
2000 Massachusetts Avenue, NW
Washington, DC 20036

Timmons Group
1401 E. Cary Street
Suite 401
Richmond, VA 23219

Virginia Housing Dev Authority
601 S Belvidere Street
Richmond, VA 23220

Walter Parks Architects
313 N. Adams Street
Richmond, VA 23220

Williams Mullen
1700 Dominion Tower
999 Waterside Drive
Norfolk, VA 23510

Winthrop & Weinstine, P.A.
Capella Tower, Suite 3500
225 South Sixth Street
Minneapolis, MN 55402

**United States Bankruptcy Court
Eastern District of Virginia**

In re **Model Tobacco Development Group, LLC**

Debtor(s)

Case No.
Chapter

11

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for Model Tobacco Development Group, LLC in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

CAH Model Tobacco, LLC
5301 Westbard Circle, Suite147
Bethesda, MD 20816

MK Richmond, LLC
10505 Dunne Meadow Road
Vienna, VA 22182

Model Tobacco Master Tenant,
LLC
5301 Westbard Circle,Suite 147
Bethesda, MD 20816

SS Richmond, LLC
2000 Massachusetts Avenue, NW
Washington, DC 20036

None [*Check if applicable*]

December 30, 2024

Date

/s/ Justin P. Fasano

Justin P. Fasano

Signature of Attorney or Litigant
Counsel for **Model Tobacco Development Group, LLC**

McNamee Hosea, P.A.

6404 Ivy Lane, Suite 820
Greenbelt, MD 20770
301-441-2420 Fax:301-982-9450
jfasano@mhlawyers.com